IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI SOUTHWESTERN DIVISION

JODELLE L. KIRK)	
)	
Plaintiff,)	
)	
v.)	CASE NO: 3:13-cv-05032-DGK
)	
SCHAEFFLER GROUP USA, INC., et al.,)	
)	
Defendants.)	

NOTICE OF DEPOSITION DUCES TECUM OF KATHIE ALLISON

PLEASE TAKE NOTICE that Defendants, Schaeffler Group USA, Inc., FAG Holdings, LLC; and FAG Bearings, LLC, (collectively "Defendants"), by and through the undersigned counsel, will take the deposition upon oral examination of Kathie Allison October 22, 2014, beginning at 9:30 a.m. The deposition will take place at Humphrey, Farrington & McClain, PC, 221 W. Lexington, Suite 400, Independence, MO 64051, and will continue thereafter from day-to-day except weekends and holidays, or as counsel shall stipulate, until complete.

Pursuant to Federal Rules of Civil Procedure 30(b)(2) and 34, Defendants request that Ms. Allison bring with her all documents and tangible things in her possession or subject to her control regarding the matters set forth in the attached Exhibit A to this deposition notice.

The deposition will be taken before a notary public authorized by law to administer oaths and to take deposition testimony and will be recorded using audiotape, videotape or stenographic means, or a combination of these means. The deposition will be taken for all permissible uses and purposes, pursuant to Fed. R. Civ. P. 30.

Dated: September 18, 2014 Respectfully submitted,

DENTONS US LLP

By: <u>/s/ Gregory T. Wolf</u>

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ATTORNEYS FOR DEFENDANTS SCHAEFFLER GROUP USA, INC.; FAG HOLDING, LLC; AND FAG BEARINGS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of September 2014, a true and accurate copy of the foregoing document was served upon the following counsel by email transmission and by the Court's electronic CM/ECF notification system:

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/s/ Gregory T. Wolf

ATTORNEY FOR DEFENDANTS SCHAEFFLER GROUP USA, INC.; FAG HOLDINGS, LLC; AND FAG BEARINGS, LLC

EXHIBIT A

- 1. A current copy of Ms. Allison's curriculum vitae.
- 2. Ms. Allison's entire file(s) concerning this case.
- 3. All documents reviewed by Ms. Allison concerning her work on this case.
- 4. All documents prepared by or on behalf of Ms. Allison concerning her work on this case.
- 5. All documents relied on, in whole or in part, by Ms. Allison concerning her work on this case.
- 6. All documents or records reflecting the dates and/or amount of time Ms. Allison has spent working on this case and descriptions of work performed by Ms. Allison on this case.
- 7. All bills, invoices or payments concerning Ms. Allison's work on this case.
- 8. All written contracts or agreements between Ms. Allison and Plaintiff's counsel concerning her work on this case.
- 9. All documents that Ms. Allison believes support her opinions in this case.
- 10. All articles, treatises, claim manuals, written procedures or policies, statutes, case law or other writings that Ms. Allison has relied on concerning her work on this case.
- 11. All correspondence or other writings between Ms. Allison and Plaintiff or Plaintiff's counsel relating to compensation for Ms. Allison's study or testimony.
- 12. All correspondence or other writings between Ms. Allison and Plaintiff or Plaintiff's counsel identifying facts or data that Plaintiff or Plaintiff's counsel provided and Ms. Allison considered in forming the opinions to be expressed.
- 13. All correspondence or other writings between Ms. Allison and Plaintiff or Plaintiff's counsel identifying assumptions that Plaintiff or Plaintiff's counsel provided and Ms. Allison considered in forming the opinions to be expressed
- 14. All articles, books, chapters, papers or other documents written by Ms. Allison regarding insurance bad faith, insurance claims handling procedures and/or interpleader.
- 15. Copies of any and all reports Ms. Allison has written or has had written in any litigation in the past four (4) years.
- 16. Copies of the transcripts of any testimony Ms. Allison has given in the past four (4) years.